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April 20, 2022

**Via CM/ECF**

Honorable David J. Novak  
U. S. District Court, Eastern District of Virginia  
Walter E. Hoffman  
United States Courthouse  
600 Granby Street  
Norfolk, VA 23510

***Re:     Campbell, et al. v. Intercontinental Capital Group, Inc.,***  
**No. 3:22-cv-00034-DJN**

Dear Judge Novak:

I represent the Defendant Intercontinental Capital Group, Inc. ("Defendant") in the above referenced action and write jointly with Plaintiffs regarding the status of this matter and to request this matter be stayed until May 6, 2022.

On April 19, 2022, the Parties engaged in an in-person mediation with a private mediator in White Plains, New York. The Parties tentatively agreed upon the terms to settle this matter. However, the Parties also agree that financial information from the Defendant is necessary before the settlement can be finalized. Plaintiffs have the option to not move forward with the settlement after reviewing certain financial information to be produced by Defendant. Additionally, there is a group of approximately 215 putative plaintiffs (out of 2500) for whom additional information is needed to determine if they may be incorporated into the settlement. Accordingly, the Parties have agreed upon a term sheet and to allow Defendant a week to produce for review, the agreed upon financial data and additional information concerning the aforementioned subset group of putative plaintiffs.

The Parties are optimistic that they will be able to reach a final settlement shortly and kindly request that this matter be stayed until May 6, 2022, so that final terms may be reached and a formal agreement may be executed.



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Very truly yours,

A handwritten signature in black ink, appearing to read "Katharine Thomas Batista".

Katharine Thomas Batista